

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE REVOLUTION LIGHTING  
TECHNOLOGIES, INC. DERIVATIVE  
ACTION,

Lead Case No. 1:19-cv-03913

This Document Relates To:  
ALL ACTIONS

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF DERIVATIVE  
SETTLEMENT AND APPROVAL OF SHAREHOLDER NOTICE**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated January 30, 2020, annexed as Exhibit 1 to the Declaration of Thomas J. McKenna In Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Derivative Settlement and Approval of Shareholder Notice ("McKenna Declaration"), the accompanying Plaintiffs' Memorandum Of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Derivative Settlement and Approval of Shareholder Notice, and the McKenna Declaration, plaintiffs in the above-captioned action, together with plaintiffs in the related derivative action pending in the District of Connecticut (together with the above-captioned action, the "Actions"), will move this Court before the Honorable J. Paul Oetken in the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007 for entry of an Order that will, among other things: (i) preliminarily approve the proposed Settlement of the Actions on the terms set forth in the Stipulation; (ii) approve the proposed form and manner of providing notice of the Settlement to Revolution shareholders as of January 30, 2020; and (iii) schedule a final

approval hearing to determine whether the proposed Settlement should be finally approved and to consider Plaintiffs' Counsel's application for an award of attorneys' fees and reimbursement of expenses incurred in connection with the prosecution of the Actions.

For the reasons set forth in Plaintiffs' Memorandum of Law, the McKenna Declaration, and the Stipulation, Plaintiffs respectfully request that the Court find that the proposed Settlement merits preliminary approval. A proposed Order entitled [proposed] Preliminary Approval and Scheduling Order, which grants the relief requested herein, is attached as Exhibit D to Stipulation, which is Exhibit 1 to the McKenna Declaration.

Dated: March 23, 2020

Respectfully submitted,

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